RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767 TDD 401-831-5508

19 June 1997

Mr. Philip Otis, P.E., Remedial Project Manager
US Department of the Navy, Northern Division
Code 18, Mail Stop #82
10 Industrial Highway
Lester, PA 19113-2090

RE: Addendum to the Sites 03 and 09 Phase III Work Plan
Offshore Geotechnical Sampling and Confirmation Study at Site 09
NCBC Davisville, Rhode Island
Submitted 14 May 1997, Dated 12 May 1997

Dear Mr. Otis;

The Rhode Island Department of Environmental Management (RIDEM) Office of Waste Management has reviewed the above referenced document and comments are attached.

RIDEM looks forward to working with the Navy and EPA on the implementation of this workplan. If you have any questions or require additional information please call me at (401) 277-3872 ext. 7138.

Sincerely,

Richard Gottlieb, P.E.
Principal Sanitary Engineer

Attachment:

cc: W. Angell, DEM OWM
C. Signore, DEM OWM
C. Williams, EPA Region 1
H. Cohen, RIEDC
M. Cohen, ToNK
W. Davis, CSO NCBC
J. Shultz, EA Eng.

Comments For:

Addendum to the
Sites 03 and 09 Phase III Work Plan
Offshore Geotechnical Sampling and
Confirmation Study at Site 09 (NCBC)

Submitted 14 May 1997, Dated 12 May 1997

1. **Page 1, Section 1, Introduction and Objectives;**
Paragraph 2, Sentence 1.

EA was tasked to perform geotechnical sampling and a confirmation study to provide data for design of shoreline revetment for Site 09, to obtain chemical data, and to provide data to confirm previous geophysical studies.

Please explain the rationale for obtaining the chemical data as it may affect boring locations. RIDEM feels the chemical data should be obtained for two objectives: 1) to confirm the fate and transport modeling performed for the site and 2) to confirm the physical findings of the seismic reflection and magnetometry surveys with respect to potential flowpaths. These results would then be used in the development of the long term monitoring plan for Allen Harbor Landfill.

2. **Page 2, Section 2.1.1, Drilling Activities;**
Paragraph 1, Sentence 1.

This sentence states that 13 borings will be advanced to up to 50 feet below grade or to refusal, whichever occurs first. It is recommended that borings be advanced to bedrock. In addition, as noted in previous comments regarding Allen Harbor Landfill, RIDEM has requested that borings be made within the Harbor to validate the model used to predict fate and transport of COCs. Since the barge is readily available it is recommended that additional borings be advanced in the middle of the harbor to confirm the modeling results and to also obtain information regarding possible plume migration from Calf Pasture Point. RIDEM will provide possible boring locations within a few days time.

3. **Page 4, Section 2.1.3, Sample Identification, Handling, and Analysis;**
Table.

The following tests should also be run on the soils:

* ASTM C-136 (Sieve analysis)

* ASTM D-1140 (Percentage Fines)

* ASTM D-698 (Standard Proctor(Moisture-Density relationship))

* ASTM D-3080 (Direct Shear Test)

In addition, please state the alpha-numeric codes to be used in identifying the samples.

OFFSHORE.RWG/RICHG